

Appendix A to August 2025 Joint Status Report

Defendant	Production as of 9/6	Add'l Production as of 10/4 ¹	11/1	12/6	1/3/25	2/7	3/7	4/4	5/2	6/6	7/3	8/1
AIR Communities	* ²	*75	*	*	*	*	*	*	*	*	*	*
Allied Orion	448			*	*	*	*	*	*	*	*	*
Apartment Management Consultants	81	92										
Avenue5	*	*	*	*	*	*	*	*	*	45,448*	*	*
Bell Partners	17 ³	21				1,130	342	317,063		10	*	*
BH Management	264		1 ⁴			128	174,904	238,312	7	2		*
Bozzuto Management	370 ⁵	26,583		*	*	*	*	*	27,995*	5*	1*	*
Brookfield	10					311*	*	*	*	*	*	*
Camden Property Trust	56,778	9		5,276	49,430	26,514	7	5,834	47,101			
CH Carter- Haston	4		1				15	*	*	*	*	*

¹ Going forward, any new footnotes (*i.e.*, those addressing information in the current joint status report) will be in bold.

² An * denotes Defendants with whom Plaintiffs have reached settlements in principle.

³ Bell Partners is producing its only government production, a CID response to the Washington DC AG, prior to the September 13, 2024, status conference.

⁴ The number of documents represented as produced by BH Management in the November 2024 JSR included an overlay of previously-produced documents, so the number of documents produced for that time period has been reduced in the March 2025 JSR to eliminate duplicates of previously-produced documents.

⁵ By the September 13, 2024 status conference, Bozzuto will have produced nearly 20,000 documents to Plaintiffs.

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ConAm	11	27 ⁶		*	*	*	*	*	*	*	*	*
Cortland	135,709		1				21,074	1,610,515				
CWS	44	3	691	630		*	*	*	*	*	*	*
ECI Management, LLC	59	38		1,066		26,416	41,632	65,919	3			*
Equity Residential	4,887	1			80,995	2,673	3,036	76,619	13,285			2
Essex	238 ⁷		49,701		50,160	329,424		134,511				
First Communities	15,116	9						*	*	*	*	*
FPI Management	11*	*	*	*	*	*	*	*	*	*	*	*
Greystar	11 ⁸	686,286			22,364	41,406	71,392	208,764				
Highmark Residential	11,207	126,789			357		106,275	156,940		798		
IRT	17			1,538		570	68,865	86,130	262	47		660
Kairoi	24			129	117			204,410				*
Knightvest	12							151,604	222,853*	*	*	*

⁶ This entry and the total production number as of October 4, 2024 have been updated to account for an overlooked document from ConAm's earlier productions.

⁷ Essex's production numbers for September and October 2024 have been amended to account for discrepancies resolved by the parties. The total production numbers for those months have been updated accordingly.

⁸ By the September 13, 2024, status conference, Greystar will have produced over 127,000 documents to Plaintiffs, and intends to make an even larger production before the October 12, 2024, status conference.

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Lantower	18			32*	*	*	*	*	*	*	*	*
Lincoln Property Co. (Willow Bridge)	33,027	117,933	96,280	25,765	1,315	6,295	9,727	66,555	179,605	410⁹		
MAA	6 ¹⁰	38,237		3,917	14	14,773	110,219	150,680	127			
Mission Rock	385			*	*	*	*	*	*	*	*	*
Morgan Properties	229			187	8,035	54,220	336,703	295,858				
Pinnacle	*	*	*	*	*	*	*	*	*	*	*	*
Prometheus	11	10				11,891*	*	*	*	*	*	*
RealPage	821,386	6,315				599,300		293,684		1,387		
Rose Assocs	39 ¹¹	14	18		25	10,715	17,702	133,734				
RPM	43,662	17,061	23,206	15,168	8,341	35,931	21,674	27,049	688,372	5,878		
Sares Regis	256	1			4	8	956		63,496	316,950	467,932	
Security Properties	81,698					*	*	*	*	*	*	*
Sherman	129			604				*	*	*	*	*

⁹ Willow Bridge's production numbers for April and June 2025 have been amended to account for discrepancies resolved by the parties. The total production numbers for those months have been updated accordingly.

¹⁰ MAA intends to make a production of over 30,000 documents as early as today (September 6, 2024), and a second sizable production next week.

¹¹ Rose has produced 39 documents (1,923 pages of documents), but Plaintiffs contend Rose's productions do not comply with the ESI order and therefore refer to this production as "2" documents here. The parties are working on resolving this issue. The parties have resolved this issue, as indicated in the chart above.

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Simpson	22		1,611					*	*	*	*	*
Thoma Bravo	1,080	500	1,572	337	321	283	1,099	2,488				
The Related Cos	5	110	6	2		35	13	48,217				
Thrive Communities	17 ¹²		8		117	*	*	*	*	*	345,882*	*
Trammell Crow and Crow Holdings	331			18,392			52,356	218,107 ¹³		99		
UDR	1,050	101,348	116,865	63,551	97,629	42,432	371,241		165,573			
Windsor	225,530								35,543			*
Winn	132	509		*	*	*	*	*	*	*	*	*
ZRS	149				152,658			758,040			101	
TOTAL:	1,434,480¹⁴	1,121,971	289,961	136,594	471,882	1,204,455	1,409,232	5,251,033	1,444,222	371,034	813,916	662

¹² Thrive intends to supplement its document production prior to the September 13, 2024, status conference with a sizable production.

¹³ The number of documents in this row and the respective totals include documents produced by Maple Multifamily Development, LLC.

¹⁴ Defendants CONTI and Dayrise have been removed from this list as a result of their inactive status in this litigation. The total for the September 2024 Joint Status Report has been updated to reflect the omission of the 27 documents produced by Dayrise.